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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ARNOLD ABRERA,

plaintiff,

v.

GAVIN NEWSOM, in his official capacity
as Governor of the State of California; ROB
BONTA, in his official capacity as Attorney
General of the State of California; ANNE
MARIE SCHUBERT, in her official
capacity as County of Sacramento District
Attorney; COUNTY OF SACRAMENTO;
BOBBY DAVIS, in his official capacity as
Chief of the Elk Grove Police Department;
JONATHAN P. HOBBS, in his official
capacity as the City Attorney for the City of
Elk Grove; CITY OF ELK GROVE;

defendants.

No. 2:22-cv-1162 JAM DB

**NOTICE OF MOTION FOR
PERMISSION FOR ATTORNEY
DAN KARALASH TO WITHDRAW
AS ATTORNEY OF RECORD**

Date: 1/24/2023

Time: 1:30 p.m.

Hon. Judge: John A. Mendez

Location: Courtroom 6, 14th floor
501 I Street
Sacramento, CA

Action Filed: July 5, 2022

TO THE COURT AND ALL PARTIES,

PLEASE TAKE NOTICE that on **January 24, 2022, 1:30 p.m.**, before the Honorable
Judge **John A. Mendez, Courtroom 6, 14th floor** in the above-entitled court at 501 I Street,
Sacramento, CA, Attorney Daniel M. Karalash will move the Court to withdrawal as attorney of
record for Plaintiff ARNOLD ABRERA because of the conflict of interest created by California

1 Code of Civil Procedure § 1021.11, enacted in Section 2 of Senate Bill 1327 (hereinafter “SB
2 1327), and this Court’s denial of the request for injunctive relief (Docket Entry # 29). Plaintiff
3 ARNOLD ABRERA opposes my withdraw from this action. (See First Amended Complaint, ¶
4 460, Docket Entry 16, also found at Docket Entry 19-3, **Exhibit “1”**; Reply, 13:12-16, Docket
5 Entry 24; **Abrera Decl.** ¶s 20-24, 41 Docket Entry 20; **Karalash Decl.** ¶s 12, 15, 22, Docket
6 Entry 24-1.)
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8 **Plaintiff ARNOLD ABRERA opposes my motion to be relieved as his attorney of**
9 **record. A copy of this motion was electronically served on him and Mr. Gorski.**

10 This motion is based on this notice of motion and motion, the memorandum of points and
11 authorities filed in support, and supporting declarations, and the order denying the request for
12 preliminary injunction (Docket Entry # 29). This motion is also based on the pleadings and
13 records already on file, and on any further matters the Court deems appropriate.
14

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16 DATED: December 16, 2022

Respectfully submitted,
STRATEGIC LAW COMMAND
/s/ Daniel M. Karalash
Daniel M. Karalash
Attorney for Plaintiff Arnold Abrera